

R E C E I V E D

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

JAN 20 2017

AT 8:30 \_\_\_\_\_ M  
WILLIAM T. WALSH  
CLERK

In re BLACKROCK MUTUAL FUNDS  
ADVISORY FEE LITIGATION

Master File No. 3:14-cv-01165-FLW-TJB

**JOINT STATUS REPORT REGARDING DISCOVERY**

The parties respectfully submit this Joint Status Report Regarding Discovery pursuant to the Court's order dated December 15, 2016.

**A. Depositions**

1. Following the last status conference on December 15, 2016, Plaintiffs have taken depositions of three BlackRock employees and one non-party witness. Plaintiffs also requested the deposition of one additional BlackRock employee, and that deposition is scheduled for January 20, 2017. Including the deposition scheduled for January 20, Plaintiffs will have taken eight depositions in this action.

2. Following the December 15 status conference, Defendants took the deposition of Plaintiff Owen Clancy.

**B. Document Discovery**

3. As discussed at the December 15 status conference, Plaintiffs served their Second Request for Production of Documents (the "Second Request") on December 8, 2016.

4. Defendants served Responses and Objections to the Second Request on January 9, 2017, and made an initial production of documents in response to the Second Request on the same date. Defendants then made a second production of documents in response to the Second Request,

which Plaintiffs received on January 17, 2017. The parties continue to discuss Defendants' objections to the Second Request and the scope of documents to be produced.

5. On December 22, 2016, Plaintiffs made a follow-up request (the "December 22 Request") for certain documents that were identified in depositions and that Plaintiffs contend are responsive to their First Request for Production of Documents. The parties continue to discuss production of documents included in the December 22 Request.

6. Defendants intend to make a supplemental document production on January 19, 2017, which shall include public filings that Defendants may rely upon as part of their defense of this action, as well as additional documents responsive to Plaintiffs' First and Second Requests for Production.

**C. Extension of Fact Discovery Deadline**

7. The parties propose that they be permitted until February 3, 2017 to reach an agreement regarding documents to be produced in response to the Second Request and the December 22 Request and for Defendants to complete production of any such documents. *Granted*

8. Plaintiffs reserve the right to request a further extension of the fact discovery deadline beyond February 3, if, after review of such documents and the documents produced by Defendants on January 19, Plaintiffs believe that additional discovery is necessary. Defendants do not believe that any additional discovery is necessary or appropriate.

*A status update is to be submitted  
by February 8, 2017.*

So Ordered this 20<sup>th</sup> day  
of January, 2017

*[Signature]*